

CONRAD L. ZUBEL, OSB # 035021

Zubel Law Offices, P.C.
conrad@zubelpc.com
Three Town Center
10121 S.E. Sunnyside Road, Suite 300
Clackamas, OR 97015
Telephone: (503) 220-1227
Telefax: (503) 220-8584
Attorney for Plaintiff

BILLY J. WILLIAMS, OSB # 901366

United States Attorney
STEPHEN J. ODELL, OSB #903530
Assistant U. S. Attorney
steve.odell@usdoj.gov
1000 S. W. Third Avenue, Suite 600
Portland, OR 97204-2902
Telephone: (503) 727-1024
Telefax: (503) 727-1117
Of Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

CHERRY ALI, an individual, formerly
d/b/a TAWAKAL GROCERY HALAL,

Case no. 3:17-cv-577-MO

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant,

**JOINT MOTION FOR
EXTENSION OF EFFECTIVE
DATE OF DISMISSAL ON
BASIS OF SETTLEMENT**

*Expedited Consideration & Ruling
Respectfully Requested*

Pursuant to Fed. R. Civ. P. 6(b) and LR 7-1, Plaintiff and Defendant hereby jointly and respectfully move for a further 32-day extension in the effective date of the Order of Dismissal (Dkt. #18) that the Court entered on Mar. 28, 2018, in response to notice that Plaintiff's counsel provided pursuant to LR 41-1(a) that the parties had reached a substantial agreement on the terms and conditions of a settlement. In that order, the Court dismissed this action with prejudice and without costs and with leave, upon good cause shown initially within sixty (60) days, for the parties to seek the setting aside of its order of dismissal and reinstatement of this action if the

settlement were not consummated within that period. The parties now jointly move to extend the effective date of that original order of dismissal by another 32 days, up to and including Aug. 31, 2018, in order for the parties to finalize the language of a draft of the settlement that has been prepared and to secure approval of that final settlement from an appropriate official within the Department of Justice that is required before undersigned counsel for Defendant can execute it on behalf of the United States.

In light of the foregoing, Plaintiff and Defendant hereby respectfully submit that good cause exists for the relief sought by this motion and therefore respectfully request the Court to extend the effective date of dismissal in this action by another 32 days, to Aug. 31, 2018.

Jointly and respectfully submitted this 27th day of July 2018.

s/ Conrad L. Zubel
CONRAD L. ZUBEL
Zubel Law Offices, P.C.
Attorney for Plaintiff

s/ Stephen J. Odell
STEPHEN J. ODELL
Assistant United States Attorney
District of Oregon
Of Attorneys for Defendant